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## Maine Chapter

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To: Mr. George Dutweiler  
Docket Management Facility  
US Department of Transportation  
400 Seventh St. SW  
Washington, DC 20590  
<http://dms.dot.gov>

From: Nancy C. Rich  
Wildlife Committee of the State of Maine Chapter of the Sierra Club  
30 Mulberry St.  
Buxton, Maine 04093

Re: USCG 2005-20380

Date: April 18, 2005

I am writing this letter on behalf of the State of Maine Chapter of the Sierra Club in regard to the Port Access Routing Study (70 FR 8312-8314).

It has been estimated that ship strikes cause at least 35% of all deaths of right whales. Indeed, so far this year, four deaths of female right whales of reproductive age have been documented. One of the whales was killed off the Virginia coast, two off the coast of Nantucket and one off the coast of Georgia. In addition, at least three female whales killed by ships in 2004 were carrying near full-term fetuses as they traveled to their traditional calving sites. This is particularly bothersome as scientists have determined that females only reach reproductive age at approximately 7.5 years old and that they give birth only every 3 to 5 years. Current estimates are that only approximately 60 breeding females are in existence at this time.

The survival of this magnificent mammal requires immediate measures for protection. There is no need for further studies or data. What is required to save this critically endangered animal is ACTION.

We are asking that the Coast Guard should now analyze all of the routing measures that were put forth by the National Fisheries Service in the Advanced Notice of Proposed Rulemaking. We are also urging that the Coast Guard consider expanding the protection beyond the times and areas suggested in the Advanced Notice of Proposed Rulemaking. More specifically, we ask that the Coast Guard consider routing measures to protect the whales within the Cape Cod Bay area as well as the adjacent area called "off Race Point" from December through May of each year.

The United States has the authority under its domestic laws to regulate ship traffic. It will be shameful if officials do not take the simple measures of regulating the traffic in order to protect the migratory routes of the right whales.

Thank you for your consideration.

